

## REMARKS

Claims 1-16 are pending in the present application. Claims 1-16 have been rejected. Claims 1, 8, and 13 have been amended.

Claims 1-3, 6-9, and 12-14 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Call (U.S. Patent Application Publication No. 2002/0143521). It is respectfully submitted that claims 1-3, 6-9, and 12-14 are allowable over the art of record for the reasons set forth below.

Claim 1 is directed to a storage platform that comprises a set of schemas that define different types of items, elements, and relationships, along with a customizable subset of schemas that extend the set of schemas and are dependent on the set of schemas. An API is also provided and comprises a class for each of the different items, elements, and relationships defined in the set of schemas. Thus, the storage platform allows for the schemas to be extended to include a set of subschemas, thereby providing extensibility to the storage platform. The subsets are customizable, e.g., by a customer or vendor. (See application, as originally filed, at paragraphs [0162] – [0165], for example).

Call describes schemas (e.g., paragraphs [0115] – [0117]), but neither discloses nor suggests subschemas that are customizable and dependent on the schemas.

Claims 8 and 13 include similar features to those described above with respect to claim 1. Based on the foregoing, claims 1, 8, and 13 should not be rejected as being anticipated by Call. Thus, claims 1, 8, and 13 are patentable for the reasons set forth above. Claims 2, 3, 6, and 7 are dependent from claim 1, claims 9 and 12 are dependent from claim 8, and claim 14 is dependent from claim 13, and are therefore allowable as well. Withdrawal of the rejections of claims 1-3, 6-9, and 12-14 under 35 U.S.C. § 102(e) is respectfully requested.

Claims 4, 5, 10, 11, 15, and 16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Call in view of Freyssinet et al. (U.S. Patent No. 6,477,564). Claims 4 and 5 are dependent from claim 1, claims 10 and 11 are dependent from claim 8, and claims 15 and 16 are dependent from claim 13, and are therefore patentable for the reasons set forth above with respect to claims 1, 8, and 13. Freyssinet fails to cure the deficiencies of Call. Freyssinet describes data routing and transformation but does not teach or suggest a

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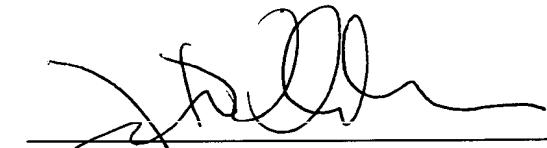
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customizable set of subschemas. Therefore, withdrawal of the rejections of claims 4, 5, 10, 11, 15, and 16 under 35 U.S.C. § 103(a) is respectfully requested.

In view of the foregoing amendments and remarks, Applicants submit that the above-identified application is in condition for allowance. Early notification to this effect is respectfully requested.

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